

JMK:MJJ  
F.#2014R01293

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

15-90 M

- against -

COMPLAINT

ALVAUN THOMPSON,

also known as “LP,” “Legit Pimp” and  
“AT,”

(18 U.S.C. §§ 1591(a)(1) and 2251(a))

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

JONATHAN B. GERACI, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation (“FBI”), duly appointed according to law and acting as such.

On or about and between April 2013 and the present, within the Eastern District of New York and elsewhere, the defendant ALVAUN THOMPSON, also known as “LP,” “Legit Pimp” and “AT,” knowingly recruited, enticed, harbored, transported, provided, obtained and maintained by any means, one or more minors, whose identities and ages are known to the undersigned affiant, in and affecting interstate or foreign commerce, knowing that such minors had not attained the age of 18 years and that such minors would be caused to engage in commercial sex acts.

(Title 18, United States Code, Section 1591(a)(1))

In or about December 2014, within the Eastern District of New York and elsewhere, the defendant did knowingly and intentionally employ use, persuade, induce, entice and coerce a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct which visual depictions were produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce.

(Title 18, United States Code, Section 2251(a))

The source of my information and the grounds for my belief are as follows:

1. I have been a Special Agent with the FBI since approximately August 2006, and I am responsible for conducting and assisting in investigations into the activities of individuals and criminal groups responsible for violations of criminal law relating to the sexual exploitation of minors. I am familiar with the facts and circumstances of this investigation from, among other things, my personal participation in the investigation, my review of law enforcement records and databases, and discussions with law enforcement officers.

2. On or about September 27, 2013, the defendant was arrested by New York Police Department (“NYPD”) officers in the Bronx, New York in connection with a home invasion robbery. NYPD reports concerning the robbery provide, in sum and substance and relevant part, that the defendant and multiple co-conspirators stole property from an individual (the “Complainant”) following a dispute concerning the Complainant’s alleged failure to pay for prostitution services arranged by the defendant.

3. After waiving his Miranda rights, the defendant made a written statement, in which he admitted, in sum and substance and relevant part, to arranging the provision of prostitution services for the Complainant. The defendant also admitted taking the Complainant’s property, though he stated, in sum and substance, that the Complainant

permitted him to take such property in lieu of cash payment for the prostitution services the defendant had arranged.

4. Upon his arrest, the defendant provided NYPD officers with the following cellular telephone numbers for him: 347-666-9996 (the “9996 Telephone Number”) and 347-666-7008 (the “7008 Telephone Number”).

5. On or about November 7, 2013, a minor (“Minor Victim 1”), who was born in 1999 and whose identity is known to the undersigned affiant, was arrested by NYPD officers in Brooklyn, New York for engaging in street prostitution. After her arrest, NYPD officers permitted Minor Victim 1 to make at least one telephone call, and Minor Victim 1 elected to call the 9996 Telephone Number—i.e., one of the telephone numbers the defendant provided to NYPD officers upon his arrest on or about September 27, 2013.

6. Law enforcement officers conducted Google searches for the 9996 Telephone Number and discovered that it appeared in prostitution advertisements in the “Adult Escorts” section of [www.backpage.com](http://www.backpage.com) (“Backpage”), an Internet-based classified advertising website. Certain records related to these advertisements contained the defendant’s name and contact information.

7. For example, the defendant’s name and contact information appeared in records related to a prostitution advertisement published in the “Brooklyn escorts” section of Backpage on or about August 27, 2013 (the “August 27, 2013 Backpage Advertisement”). Specifically, Backpage “customer information” associated with the August 27, 2013 Backpage Advertisement contains the defendant’s name, the email address “atrillz11@gmail.com” and the street address “725 Stanley ave 3a, Brooklyn, New York.” Records provided by Google reveal that the email address “atrizz11@gmail.com” is subscribed to by the defendant, and

criminal history reports for the defendant reveal that he resides at 725 Stanley Avenue, Apartment 3A, in Brooklyn, New York. Moreover, the 7008 Telephone Number—i.e., one of the telephone numbers the defendant provided to NYPD officers upon his arrest on or about September 27, 2013—appears in the body of the August 27, 2013 Backpage Advertisement. Accordingly, there is reason to believe that the defendant published the August 27, 2013 Backpage Advertisement.<sup>1</sup>

8. The August 27, 2013 Backpage Advertisement is titled “special special special come get it . . chocolate cakes n bubbles” and features images of two females wearing underwear and kissing, accompanied by the following message, in sum and relevant part: “Wats up guys two girls 4 the low low ,,, safety 1st and no (bb) 100% real pics and no rush time is time so come get wat us want some ... let us b the 1s to please u 3476667008.” Two females are featured in the August 27, 2013 Backpage Advertisement (hereinafter “Minor Victim 2” and “Minor Victim 3”). Law enforcement officers were able to identify these females as Minor Victim 2 and Minor Victim 3, in part, because their faces are visible in the images. Minor Victim 2 and Minor Victim 3 were born in 1997 and 1996, respectively. Accordingly, Minor Victim 2 and Minor Victim 3 were approximately 16 and 17 years old, respectively, at the time the August 27, 2013 Backpage Advertisement was published.

9. Following his arrest on or about September 27, 2013, the defendant was detained at Rikers Island Correctional Facility. During his detention, the defendant made

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<sup>1</sup> Backpage “administrative data” associated with the August 27, 2013 Backpage Advertisement reveals that the Backpage user account affiliated with the email address “atrillz11@gmail.com” was created on or about April 10, 2013 and the August 27, 2013 Backpage Advertisement was first created on or about April 15, 2013. Accordingly, there is reason to believe that the defendant registered as a Backpage user no later than April 10, 2013 and began creating Backpage prostitution advertisements no later than April 15, 2013.

numerous telephone calls. The following exchange between the defendant and Minor Victim 1 was recorded on or about February 7, 2014:

Minor Victim 1: [Minor Victim 2] was telling the truth  
[when she told you my age].

Defendant: How old are you?

Minor Victim 1: I'm not . . . that's not a conversation we  
need to have right now.

Defendant: Just say a number.

Minor Victim 1: Whatever she [Minor Victim 2] said is true  
though.

Defendant: Fifteen?

Minor Victim 1: No.

. . .

Defendant: Leave me with an age.

Minor Victim 1: Fourteen.

Defendant: You fourteen. Wow.

Minor Victim 1: Alright, I love you.

Defendant: I love you too, but . . .

Minor Victim 1: You sure?

Defendant: Yeah, I do. I really do. But yeah, I'm  
going to talk to you about it.

Based on information contained in this call, there is reason to believe that the defendant was aware at this time that Minor Victim 1 had not yet attained 18 years of age.

10. On or about July 21, 2014, the defendant pled guilty in Kings County Supreme Court to one count of misdemeanor larceny in connection with the home invasion



robbery that occurred on or about August 27, 2013, and was released from Rikers Island that same day.

11. On or about December 19, 2014, NYPD officers arrested the defendant for child endangerment after finding him with Minor Victim 1 and Minor Victim 2 in a hotel room in the Bronx, New York. NYPD reports documenting this arrest indicate that the defendant told officers that the telephone number 347-613-8996 (the “8996 Telephone Number”) belonged to him. A multicolored LGG New Madison cellular telephone (the “LGG Cellular Telephone”<sup>2</sup>) was found on the defendant and seized incident to his arrest.

12. Internet searches after the defendant’s arrest revealed that prostitution advertisements featuring Minor Victim 1 and Minor Victim 2 were published on Backpage on or about December 18, 2014. For example, on or about the evening of December 18, 2014, a prostitution advertisement was published in the “Bronx escorts” section of Backpage titled “2 Girl Special 80\$\$\$ Kandii & Lucious2” (the “December 18, 2014 Backpage Advertisement”). The December 18, 2014 Backpage Advertisement features five images of Minor Victim 1 and Minor Victim 2, and Minor Victim 1’s face is visible in two of the images. Minor Victim 1 and Minor Victim 2 were 15 and 17 years old, respectively, at the time the December 18, 2014 Backpage Advertisement was published.

13. Within the December 18, 2014 Backpage Advertisement is a section titled “Other ads by this user,” which contains hyperlinks to other prostitution advertisements published by the same Backpage user responsible for publishing the December 18, 2014

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<sup>2</sup> Because the LGG Cellular Telephone appears to have been manufactured outside the United States, there is reason to believe that the LGG Cellular Telephone and certain of its components were produced using materials mailed, shipped and transported in and affecting interstate and foreign commerce.

Backpage Advertisement. One such advertisement—published on or about November 25, 2014 and titled “new girl on the block” (the “November 25, 2014 Backpage Advertisement”)—instructs potential clients to call the 8996 Telephone Number—i.e., the telephone number that the defendant provided NYPD officers upon his arrest on or about December 19, 2014. Accordingly, there is reason to believe that the defendant published both the November 25, 2014 Backpage Advertisement and the December 18, 2014 Backpage Advertisement featuring Minor Victim 1 and Minor Victim 2.

14. On or about January 20, 2015, the Honorable Lois Bloom, United States Magistrate Judge, Eastern District of New York, issued a search warrant for the LGG Cellular Telephone. A forensic examination of the LGG Cellular Telephone revealed, among other things, numerous video recordings and photographs.

15. For example, the forensic examination revealed a video recording (the “Minor Victim 1 Recording”) depicting a female performing oral sex on a male. The female in the Minor Victim 1 Recording is believed to be Minor Victim 1 because her face is clearly visible in the recording. The male in the Minor Victim 1 Recording, whose face is not visible, is believed to be the defendant, in part, because forensic analysis of the LGG Cellular Telephone establishes that the Minor Victim 1 Recording was created in or about December 2014 using the video camera on the LGG Cellular Telephone and the LGG Cellular Telephone is believed to belong to the defendant.<sup>3</sup> The male in the Minor Victim 1 Recording is also believed to be the defendant because the male’s lower abdomen and genitals are consistent

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<sup>3</sup> The LGG Cellular Telephone was seized from the defendant incident to his arrest on or about December 19, 2014 and contains numerous photographs and video recordings of the defendant and text messages addressed to the defendant.

with the defendant's lower abdomen and genitals, which are visible, along with the defendant's face, in other video recordings stored on the LGG Cellular Telephone.

16. Two short video recordings (the "Prior Recordings") created minutes before the Minor Victim 1 Recording further indicate that the defendant is the male in the Minor Victim 1 Recording. The Prior Recordings—like the Minor Victim 1 Recording—feature Minor Victim 1, whose face is visible, and a male, whose face is not visible. The male can be heard speaking in the Prior Recordings, and his voice sounds like the defendant's voice on the recorded Riker's Island telephone calls. Thus, the male in the Prior Recordings is believed to be the defendant. In addition, the male in the Prior Recordings appears to be wearing the same underwear as the male in the Minor Victim 1 Recording. Accordingly, there is reason to believe that the male in the Prior Recordings—who is believed to be the defendant—is also the male in the Minor Victim 1 Recording.

17. The angle from which the Minor Victim 1 Recording was filmed and the closeness of the camera to Minor Victim 1's face and the male's genitals suggest that the male himself, as opposed to an unidentified third-party, was holding the LGG Cellular Telephone and filming the sexual encounter. Accordingly, there is reason to believe that the defendant produced the Minor Victim 1 Recording.

18. The forensic examination of the LGG Cellular Telephone also revealed, among other things, numerous photographs of Minor Victim 1, Minor Victim 2 and Minor Victim 3 stored on the LGG Cellular Telephone. For example, the forensic examination revealed a photograph of Minor Victim 1 on the LGG Cellular Telephone that appears identical to a photograph of Minor Victim 1 featured in the December 18, 2014 Backpage Advertisement. Notably, the forensic examination established that this photograph was



created on or about December 15, 2014 using the camera on the LGG Cellular Telephone. In addition, the forensic examination revealed a photograph of Minor Victim 2 and Minor Victim 3 on the LGG Cellular Telephone that appears identical to a photograph of Minor Victim 2 and Minor Victim 3 featured in the August 27, 2013 Backpage Advertisement. Relatedly, the forensic examination established that the LGG Cellular Telephone was frequently used to access the Backpage website.

WHEREFORE, your affiant respectfully request that the defendant ALVAUN THOMPSON may be dealt with according to law.

S/ Jonathan Geraci

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JONATHAN B. GERACI  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this  
2nd day of Feb 2015

S/ Vera Scanlon

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THE HONORABLE VERA M. SCANLON  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK